

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

Mi Familia Vota, *et al.*,

*Plaintiffs,*

v.

Greg Abbott, *et al.*,

*Defendants.*

No. 5:21-cv-00920-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND NATIONAL  
REPUBLICAN CONGRESSIONAL COMMITTEE’S [PROPOSED] ANSWER**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees deny that Senate Bill (“SB”) 1 is a “voter suppression law,” is “a calculated effort to disenfranchise voters,” “will unconstitutionally burden qualified voters,” or will “prevent many voters from lawfully casting their ballots in future elections.” Paragraph 1 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

2. The Republican Committees deny that SB 1 “places additional heavy burdens on voters in Texas” or “prohibit counties from making voting accessible and safe for lawfully registered voters.” The allegations in Paragraph 2 are legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is

required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 2 and so deny them.

3. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination, was enacted “for the purpose and with the effect of making it harder for voters of color to vote,” or is an “attempt to continue [a] tradition of discrimination.” The allegations in Paragraph 3 are legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. The Republican Committees deny that the Texas Legislature “engineered SB 1 to cancel or discourage the activities used successfully by Black and Latino voters.” The statute speaks for itself and does not require a response. Paragraph 4 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The Republican Committees deny that SB 1 “burdens and limits people who provide necessary physical and language assistance to voters” or “unduly burden[s] voters who cannot vote without such assistance.” The statute speaks for itself and does not require a response. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide,

to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and so deny them.

6. The statute speaks for itself and does not require a response. Paragraph 6 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 6 and so deny them.

7. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 7 and so deny them.

8. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 8 and so deny them.

9. The Republican Committees deny the allegations in Paragraph 9.

10. The Republican Committees deny the allegations in Paragraph 10.

11. The Republican Committees deny that Plaintiffs are entitled to any relief.

## **JURISDICTION AND VENUE**

12. Paragraph 12 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 12.

13. Paragraph 13 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 13.

14. Paragraph 14 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 14.

15. Paragraph 15 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 15.

## **PARTIES**

16. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.

17. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 and so deny them.

18. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 18 and so deny them.

19. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 and so deny them.

20. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them.

21. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 and so deny them.

22. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 22 and so deny them.

23. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 and so deny them.

24. The statute speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 and so deny them. Paragraph 24 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny the allegations in Paragraph 24.

25. The Republican Committees admit that Defendant Abbott is the Governor of Texas and that Plaintiffs purport to sue him in his official capacity.

26. The Republican Committees admit that Defendant Esparza is the Deputy Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 26 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

27. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 27 otherwise states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **GENERAL ALLEGATIONS**

28. The Republican Committees deny that SB 1 “exacerbates the burdens on Texas voters across the state” and that those alleged burdens “are greatest for Black and Latino voters.” Paragraph 28 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

29. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 and so deny them.

30. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 30 and so deny them.

31. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 31 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. Paragraph 32 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 32 and so deny them.

33. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 and so deny them.

34. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 34 and so deny them.

35. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them.

36. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 36 and so deny them.

37. The referenced documents speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 37 and so deny them.

38. The referenced document speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 and so deny them.

39. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 and so deny them.

40. The Republican Committees deny that SB 1 “builds on and extends Texas’s long legacy of impeding, burdening, and discriminating against voters of color.” The Republican Committees deny the allegations in Paragraph 40.

41. The Republican Committees deny that SB 1 “was enacted with the purpose of denying or abridging the right of Black and Latino Texans to vote on account of race or color.” The Republican Committees deny the allegations in Paragraph 41.

42. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42 and so deny them.

43. The Republican Committees deny the allegations in Paragraph 43.

44. The statute speaks for itself and does not require a response. Paragraph 44 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 44 and so deny them.

45. The statute speaks for itself and does not require a response. Paragraph 45 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

46. The statute speaks for itself and does not require a response. Paragraph 46 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

47. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 and so deny them.

48. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



49. The statute speaks for itself and does not require a response. Paragraph 49 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

50. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 52 and so deny them.

53. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 and so deny them.

54. The referenced analysis speaks for itself and does not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 54 and so deny them.

55. Paragraph 55 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 55 and so deny them.

56. Paragraph 56 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

57. The statute speaks for itself and does not require a response. Paragraph 57 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.

58. The statute speaks for itself and does not require a response. Paragraph 58 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.

59. The statute speaks for itself and does not require a response. Paragraph 59 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

60. The statute speaks for itself and does not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

61. The statute speaks for itself and does not require a response. Paragraph 61 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

62. The statute speaks for itself and does not require a response. Paragraph 62 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 62 and so deny them.

63. The statute speaks for itself and does not require a response. Paragraph 63 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 63 and so deny them.

64. Paragraph 64 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 64 and so deny them.

65. The referenced reports speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. The Republican Committees deny that SB 1 “will increase voter and election official intimidation from poll watchers” or “curtail[] the ability of election officials to protect voters and volunteers and ensure secrecy of voters’ ballots.” The statute speaks for itself and does not require a response. Paragraph 66 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 66 and so deny them.

67. The statute speaks for itself and does not require a response. Paragraph 67 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 67 and so deny them.

68. The statute speaks for itself and does not require a response. Paragraph 68 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 68 and so deny them.

69. The statute speaks for itself and does not require a response. Paragraph 69 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

70. Paragraph 70 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. The statute speaks for itself and does not require a response. Paragraph 71 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

72. The statute speaks for itself and does not require a response. Paragraph 72 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

73. The statute speaks for itself and does not require a response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

74. The statute speaks for itself and does not require a response. Paragraph 74 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

75. The statute speaks for itself and does not require a response. Paragraph 75 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 75 and so deny them.

76. The statute speaks for itself and does not require a response. Paragraph 76 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 76 and so deny them.

77. The statute speaks for itself and does not require a response. Paragraph 77 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

78. The statute speaks for itself and does not require a response. Paragraph 78 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 78 and so deny them.

79. Legislative history and the statements of officials speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. To the extent a further response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 79 and so deny them.

80. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 80 and so deny them.

81. Legislative history and the statements of officials speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. To the extent a further response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 81 and so deny them.

82. The referenced statements speak for themselves and do not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud

“could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 82 and so deny them.

83. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 83 and so deny them.

84. The statute speaks for itself and does not require a response. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 84 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 84 and so deny them.

85. The Republican Committees deny that SB 1 “disenfranchis[es] Black and Latino voters” or was enacted for “pretextual” reasons. Paragraph 85 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **CLAIMS FOR RELIEF**

### **COUNT ONE**

86. The Republican Committees incorporate their responses to the preceding paragraphs.

87. The Due Process Clause of the Fourteenth Amendment speaks for itself and does not require a response.

88. The First Amendment speaks for itself and does not require a response. Paragraph 88 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

89. Court decisions speak for themselves and do not require a response. Paragraph 89 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

90. Court decisions speak for themselves and do not require a response. Paragraph 90 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

91. Court decisions speak for themselves and do not require a response. Paragraph 91 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

92. The Republican Committees deny the allegations in Paragraph 92.

93. The statute and court decisions speak for themselves and do not require a response. Paragraph 93 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations



are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 93 and so deny them.

94. The Republican Committees deny that SB 1 is unconstitutional. Court decisions speak for themselves and do not require a response. Paragraph 94 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 94 and so deny them.

95. Court decisions speak for themselves and do not require a response. Paragraph 95 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

96. The Republican Committees deny that concerns about voter fraud were “pretextual.” Court decisions speak for themselves and do not require a response. Paragraph 96 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

97. The Republican Committees deny the allegations in Paragraph 97.

98. The Republican Committees deny SB 1 was motivated by “discriminatory intent.” Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 98 and so deny them.

99. Court decisions speak for themselves and do not require a response. Paragraph 99 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

100. The Republican Committees deny that SB 1 violates the First Amendment and deny that SB 1 permits poll watchers to intimidate voters. Court decisions speak for themselves and do not require a response. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 100 and so deny them.

101. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections or that preventing fraud was not a “true motivation” of SB 1. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 101 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 101 and so deny them.

102. Paragraph 102 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

103. The Republican Committees deny that SB 1 imposes onerous requirements on any voters and deny that SB 1 causes irreparable injuries to anyone. Paragraph 103 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 103 and so deny them.

104. The Republican Committees deny the allegations in Paragraph 104 and deny that Plaintiffs are entitled to relief.

## **COUNT TWO**

105. The Republican Committees incorporate their responses to the preceding paragraphs.

106. The Fourteenth Amendment speaks for itself and does not require a response.

107. The Fifteenth Amendment speaks for itself and does not require a response.

108. Court decisions speak for themselves and do not require a response. Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

109. The Republican Committees deny that SB 1 “violates the Fourteenth and Fifteenth Amendments” and deny the allegations in Paragraph 109.

110. The Republican Committees deny the allegations in Paragraph 110.

111. The Republican Committees deny the allegations in Paragraph 111 and deny that Plaintiffs are entitled to relief.

112. The Republican Committees deny the allegations in Paragraph 112 and deny that Plaintiffs are entitled to relief.

**COUNT THREE**

113. The Republican Committees incorporate their responses to the preceding paragraphs.

114. Section 2 of the Voting Rights Act speaks for itself and does not require a response.

115. The Republican Committees deny that any provision of SB 1 “violate[s] Section 2 of the Voting Rights Act” and deny the allegations in Paragraph 115.

116. The Republican Committees deny that any provision of SB 1 “violate[s] Section 2 of the Voting Rights Act” and deny the allegations in Paragraph 116.

117. The Republican Committees deny that SB 1 abridges or denies the rights of voters of color. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 117 and so deny them.

118. The Republican Committees deny the allegations in Paragraph 118.

119. The Republican Committees deny the allegations in Paragraph 119 and deny that Plaintiffs are entitled to relief.

**COUNT FOUR**

120. The Republican Committees incorporate their responses to the preceding paragraphs.

121. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

122. The Republican Committees deny that SB 1 “violates Section 208 of the Voting Rights Act.” Section 208 of the Voting Rights Act and court decisions speak for themselves and do not require a response. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

123. The Republican Committees deny the allegations in Paragraph 123 and deny that Plaintiffs are entitled to relief.

### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

#### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs’ claims.

#### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

#### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

#### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs’ claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

October 25, 2021

Respectfully submitted,

/s/ John M. Gore

John M. Gore

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